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Subject: LDW ESD

I would like to thank EPA for considering the best available science and adjusting the RALs appropriately. The changes in the ESD are reasonable and appropriate. Using cleanup action levels that are too low not only result in unnecessary costs, it causes unnecessary impacts to the waterway and waterway users for no benefit to environment or the public.

There has been a great increase in the quantity and quality of information available to evaluate the toxicity of PAHs since the BAP number was first determined in the late 1980s. It would be irresponsible not to update the values as EPA has done. I appreciate that the new numbers have undergone a rigorous and thorough review and am confident that decisions are being made with the best information of PAH toxicity available.

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